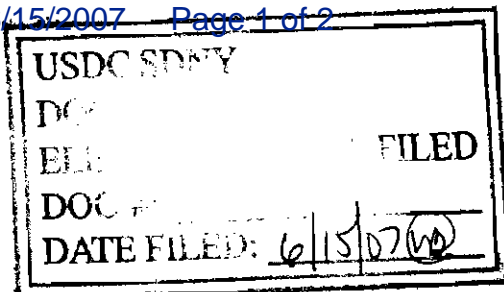


LAW FIRM
of
EUGENE J. McDONALD, ESQ.
170 Broad Street
Matawan, NJ 07747
Phone: 732-583-8485
FAX: 732-583-9739



Via Fax 212 805 7924

June 14, 2007

Hon. Sidney H. Stein, U.S.D.J.
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Attn: Laura Blakely

Re:

RE: PL Shipping & Logistics, Ltd. v. H. J. M, International Inc.,
and Bank of America and Affordable Luxury Ryan Kenny
Docket No. 07 CV 2818 (SHS)

Dear Ms. Blakely:

In accordance with my voicemail message of today, I, on behalf of myself and adversaries, request that the Rule 16(b) conference set for June 22nd, 2007 at 10:30 a.m. before Judge Stein be adjourned for at least a month. As I stated in my message, I have just filed an amended complaint pertaining to an additional airway bill of lading, counsel for defendant Bank of America has just filed an answer and counsel for defendant HJM International has just advised he will be entering the case. Further, counsel for Bank of America has provided me with information which pretty much will necessitate me filing a second amended complaint as it appears an indispensable party, ABN AMRO Bank in Chennai, India will have to be named.

Also, I attempted to serve, or should I say sent a Waiver of Service, both regular mail and certified mail to the defendant Luxury Ryan Kenny and both envelopes were returned by the postal service marked, "Return to Sender, Moved Left No Forwarding Address, Unable to Forward," so I will probably have to file a motion to have this defendant served by publication.

The conference is adjourned to Aug. 2, 2007, at 10:30 A.M.

SO ORDERED 6/15/07


[Signature]
SIDNEY H. STEIN
U.S. D.J.

In the meantime we, myself and my adversaries, are going forward with information to see who are all the players in this transaction and at this time believe an initial conference would not only be a waste of the Court's time, but also our time as we would not have much more to report as what I have stated.

By copy of this letter I am so advising my adversaries.

Awaiting your advices, and as always I remain...

Very truly yours,

A handwritten signature in black ink, appearing to read 'Eugene J. McDonald', with a long horizontal flourish extending to the right.

Eugene J. McDonald, Esq.

cc: Constantine A. Despotakis at Wilson, Elser
Attorney for Bank of America Via Fax 914 323 7001

Patrick Michael DeCharles, II, Esq. at Cichanowicz, Callan
Attorney for HJM International, Inc. Via Fax 212 344 7285